

7852 Walker Drive, Suite 200 Greenbelt, Maryland 20770 phone: 301-459-7590, fax: 301-577-5575 internet: www.jsitel.com, e-mail: jsi @jsitel.com

October 10, 2013

By Hand Delivery

Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12th Street, SW Washington, DC 20554

Re: WC Docket No. 10-90, WC Docket No. 11-42

2013 ETC Annual Report of Ben Lomand Rural Telephone Cooperative, Inc.

Study Area Code 290553

Dear Ms. Dortch:

On behalf of Ben Lomand Rural Telephone Cooperative, Inc. "Ben Lomand", JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules. Ben Lomand seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information. The redacted version is also being filed this date via the FCC's Electronic Comment Filing System.

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall JSI Vice President

301-459-7590

jkuykendall@jsitel.com

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

¹ 47 C.F.R. §§ 54.313, 54.422.

² Connect America Fund et al., WC Docket No. 10-90 et al., Protective Order, DA 12-1857 rel. Nov. 16, 2012 (Protective Order). 47 C.F.R. § 54.313(f)(2).

	m 481 - Carrier Annual Reporting Illection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control July 2013	rol No. 3060-0819
<010>	Study Area Code	290553		
<015>	Study Area Name	BEN LOMAND RURAL		
<020>	Program Year	2014		
<030>	Contact Name: Person USAC should contact with questions about this data	Todd Crandall		
<035>	Contact Telephone Number: Number of the person identified in data line <030	270-856-9983 >		
<039>	Contact Email Address: Email of the person identified in data line <030>	tcrandall@tmsvcs.com		
ANNUA	L REPORTING FOR ALL CARRIERS		54.313 Completic Required	
<100>	Service Quality Improvement Reporting	(complete attached wo	(check bo	x when complete)
<200> <210>	Outage Reporting (voice)	(complete attached wa	orksheet)	
<310>	Unfulfilled Service Requests (voice) Detail on Attempts (voice) Unfulfilled Service Requests (broadband) Detail on Attempts (broadband)	0 (attach descriptive do		
<400> <410> <420> <430> <440> <450>	Number of Complaints per 1,000 customers (voice Fixed 0.0 Mobile Number of Complaints per 1,000 customers (broat Fixed Mobile Mobile			
<800> <900> <1000> <1010> <1110>	Service Quality Standards & Consumer Protection 290553tn510 Functionality in Emergency Situations 290553tn610 Company Price Offerings (voice) Company Price Offerings (broadband) Operating Companies and Affiliates Tribal Land Offerings (Y/N)? Voice Services Rate Comparability Terrestrial Backhaul (Y/N)? Terms and Condition for Lifeline Customers	Rules Compliance (check to indicate certi (attached descriptive do (check to indicate certi (attached descriptive do (complete attached wo (complete attached wo (complete attached wo (check to indicate certi (attach descriptive do (if yes, complete attached wo (check to indicate certi (attach descriptive do (if not, check to indicate certi (complete attached wo (complete attached wo	ccument) vification) virksheet) orksheet) orksheet) virksheet) virksheet) virksheet) virksheet) virksheet) virksheet) virksheet) virksheet) virksheet)	
<2000> <2005>	Price Cap Carriers, Proceed to <u>Price Cap Addition</u> . Including Rate-of-Return Carriers affiliated with Price Cap Addition. Rate of Return Carriers, Proceed to <u>ROR Addition</u> .	rice Cap Local Exchange Carriers (check to indicate certi (complete attached wo hal Documentation Worksheet (check to indicate certi	ification)	
<3005>		(complete attached wo	orksheet)	111111

	ervice Quality Improvement Reporting Illection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	
<015>	Study Area Name BEN LOMAND	RURAL
<020>	Program Year 2014	
<030>	Contact Name - Person USAC should contact regarding this data	Crandall
<035>	Contact Telephone Number - Number of person identified in data line <030> 2	-856-9983
<039>	Contact Email Address - Email Address of person identified in data line <030>	randall@tmsvcs.com
<110>	Has your company received its ETC certification from the FCC?	(yes / no)
<111>	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	(yes / no) O
<112>	If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service. Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your concept which only receives frozen support, your progress report is only required to address voice telephony service.	npany is a
	Please check these boxes below to confirm that the attached PDF, on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.	Name of Attached Document (.pdf)
<113>	Maps detailing progress towards meeting plan targets	
<114>	Report how much universal service (USF) support was received	
<115>	How (USF) was used to improve service quality	
<116>	How (USF)was used to improve service coverage	
<117>	How (USF) was used to improve service capacity	
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.	

(200) Service Outage Reporting (Voice)	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	290553
<015>	Study Area Name	BEN LOMAND RURAL
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Todd Crandall
<035>	Contact Telephone Number - Number of person identified in data line <	030> 270-856-9983
<039>	Contact Email Address - Email Address of person identified in data line <	:030> tcrandall@tmsvcs.com

<220>	<a>	<b1></b1>	<b2></b2>	<b3></b3>	<b4></b4>	<c1></c1>	<c2></c2>	<d></d>	<e></e>	<f></f>	<g></g>	<h></h>
	NORS									Did This Outage		
	Reference	Outage Start	Outage Start	Outage End	Outage End	Number of		911 Facilities	Service Outage	Affect Multiple		1
	Number	Date	Time	Date	Time	Customers Affected	Total Number of	Affected	Description (Check	Study Areas	Service Outage	Preventative
							Customers	(Yes / No)	all that apply)	(Yes / No)	Resolution	Procedures
								ما ما				1
							See attache	u				
						WC	rksheet					
												
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(700) Price Offerings including Voice Rate Data	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	290553
<015>	Study Area Name	BEN LOMAND RURAL
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Todd Crandall
<035>	Contact Telephone Number - Number of person identified in data line <030>	270-856-9983
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcrandall@tmsvcs.com

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<701>	Residential Local Service Charge Effective Date	1/1/2013
<702>	Single State-wide Residential Local Service Charge	

<703>	<a1></a1>	<a2></a2>	<a3></a3>	<b1></b1>	<b2></b2>	<b3></b3>	<b4></b4>	<b5></b5>	<c></c>
					Residential Local			Mandatory Extended Area	
	State	Exchange (ILEC)	SAC (CETC)	Rate Type	Service Rate	State Subscriber Line Charge	State Universal Service Fee	Service Charge	Total per line Rates and Fees
					See att	ached worksheet			

(710) Broadband Price Offerings	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	290553
<015>	Study Area Name	BEN LOMAND RURAL
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Todd Crandall
<035>	Contact Telephone Number - Number of person identified in data line <03	0> 270-856-9983
<039>	Contact Email Address - Email Address of person identified in data line <03	30> tcrandall@tmsvcs.com

<711>	<a1></a1>	<a2></a2>	<b1></b1>	<b2></b2>	<c></c>	<d1></d1>	<d2></d2>	<d3></d3>	<d4></d4>
	State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rate and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service - Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached {select }
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				44 1 1					
			Se	e attached					
ŀ			work	sheet					
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(800) Op	(800) Operating Companies				31
Data Collection Form			OMB Contro July 2013	II No. 3060-0986/OMB Control No. 3060-0819	
<010>	Study Area Code		290553		
<015>	Study Area Name		BEN LOMAND RURAL		
<020>	Program Year		2014		
<030>	Contact Name - Person	USAC should contact regarding this data	Todd Crandall		
<035>	Contact Telephone Num	nber - Number of person identified in data line	<030> 270-856-9983		
<039>	Contact Email Address -	Email Address of person identified in data line	<030> tcrandall@tmsvcs.com		
<810>	Reporting Carrier	Ben Lomand Rural Telephone Cooperativ	e, Inc.		
<811>	Holding Company				
<812>	Operating Company	Ben Lomand Rural Telephone Cooperativ	re, Inc.	·	

<813>	<a1></a1>	<a2></a2>	<a3></a3>
	Affiliates	SAC	Doing Business As Company or Brand Designation
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-	See a	ttached works	heet
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900) Tri	bal Lands Reporting	FCC Form 481
Data Col	lection Form	OMB Control No. 3060-0986/OMB Control No. 3060
		July 2013
ر د010>	Study Area Code	290553
<010>	Study Area Code Study Area Name	
<020>	Program Year	BEN LOMAND RURAL 2014
<030>	Contact Name - Person USAC should contact regarding this data	Todd Crandall
<035>	Contact Telephone Number - Number of person identified in data line	
<039>	Contact Email Address - Email Address of person identified in data line	
<910>	Tribal Land(s) on which ETC Serves	
<920>	Tribal Government Engagement Obligation	
		Name of Attached Document (.pdf)
	If your company serves Tribal lands, please select (Yes,No, NA) for	
	each these boxes to confirm the status described on the attached	
	PDF, on line 920, demonstrates coordination with the Tribal	
	government pursuant to § 54.313(a)(9) includes:	
	8	
		Select
		(Yes,No, NA)
٠٠٥١٠	Needs assessment and deployment planning with a feets on Tribal	INA)
<921>	Needs assessment and deployment planning with a focus on Tribal community anchor institutions;	
<922>	Feasibility and sustainability planning;	
<923>	Marketing services in a culturally sensitive manner;	
<924>	Compliance with Rights of way processes	
<925>	Compliance with Land Use permitting requirements	
<926>	Compliance with Facilities Siting rules	
<927>	Compliance with Environmental Review processes	
<928>	Compliance with Cultural Preservation review processes	
	Compliance with Tribal Business and Licensing requirements.	

1100) No Terrestrial Backhaul Reporting Data Collection Form			FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013	
<010>	Study Area Code	290553		
<015>	Study Area Name	BEN LOMAND RURAL		
<020>	Program Year	2014		
<030>	Contact Name - Person USAC should contact regarding this data	Todd Crandall		
<035>	Contact Telephone Number - Number of person identified in data line <030>	270-856-9983		
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcrandall@tmsvcs.com		
<1120>	Please check this box to confirm no terrestrial backhaul options exist within the supported area pursuant to § 54.313(G)			
<1130>	Please check this box to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(G)			

ifeline	erms and Condition for Lifeline Customers ection Form			FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010s	Study Area Code		290553	
<010> <015>	Study Area Code Study Area Name		BEN LOMAND RURAL	
<020>	Program Year		2014	
<030>	Contact Name - Person USAC should contact regarding this data		Todd Crandall	
<035>	Contact Telephone Number - Number of person identified in data l	line <030	> 270-856-9983	
<039>	Contact Email Address - Email Address of person identified in data			
<1210>	Terms & Conditions of Voice Telephony Lifeline Plans		290553tn1210 Name of attached document (.pdf)	
<1220>	Link to Public Website	HTTP_	http://www.benlomandconnect.com/wp/v	wp-content/uploads/2013/09/BLC_Lifeline-Information.pdf
	"Please check these boxes below to confirm that the attached PDF, on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:			
<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	V		
<1222>	Details on the number of minutes provided as part of the plan,	~		
<1223>	Additional charges for toll calls, and rates for each such plan.	~		

(2000) B	rice Cap Carrier Additional Documentation		F00 F 404
,	·		FCC Form 481
	lection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819	
Including	Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers		July 2013
<010>	Study Area Code 29	0553	
<015>	,	N LOMAND RURAL	
<020>	Program Year 201	4	
<030>	Contact Name - Person USAC should contact regarding this data Tod	d Crandall	
<035>	Contact Telephone Number - Number of person identified in data line <030>	270-856-9983	
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcrandall@tmsvcs.com	
CHECK t	he boxes below to note compliance as a recipient of Incremental Connect Ameri		
	support as set forth in 47 CFR 9 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached be	elow is accurate.
	Incremental Connect America Phase I reporting		
<2010>	2nd Year Certification {47 CFR § 54.313(b)(1)}		
<2010>			
<2011>	3rd Year Certification {47 CFR § 54.313(b)(2)}		
	Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a))		
<2012>	2013 Frozen Support Certification		
<2013>	2014 Frozen Support Certification		
<2014>	2015 Frozen Support Certification		
<2015>	2016 and future Frozen Support Certification		
-2015	2010 and ratare rioten support serumation		
	Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}		
<2016>	Certification Support Used to Build Broadband		
	Connect America Phase II Reporting (47 CFR § 54.313(e))		
<2017>	3rd year Broadband Service Certification		
<2018>	5th year Broadband Service Certification		
<2019>	Interim Progress Certification		
<2020>	Please check the box to confirm that the attached PDF, on line 2021,		
	contains the required information pursuant to § 54.313 (e)(3)(ii), as a re	cipient	
	of CAF Phase II support shall provide the number, names, and addresses	s of	
	community anchor institutions to which began providing access to broa	dband	
	service in the preceding calendar year.		
<2021>	Interim Progress Community Anchor Institutions	Name of Attached Document Listing Required Information	
	,		

	ate Of Return Carrier Additional Documentation lection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
-	290553		
<010>	Study Area Code Study Area Name BEN LOMA	ND RIRAL	
<020>	Program Year 2014	NO KOKAB	
<030>		dd Crandall	
<035>	Contact Telephone Number - Number of person identified in data line <030>	270-856-9983	
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcrandall@tmsvcs.com	
CHECK t	the boxes below to note compliance on its five year service quality plan (pursu: CFR § 54.313(f)(2). I further certify that	ant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring the information reported on this form and in the documents attac	
	Progress Report on 5 Year Plan		
(3010)	Milestone Certification {47 CFR § $54.313(f)(1)(i)$ } Please check this box to confirm that the attached PDF , on line 3012 ,	Name of Attached Document Listing Required Information	
(3011)	contains the required information pursuant to § 54.313 (f)(1)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.		
(3012) (3013) (3014)	Community Anchor Institutions {47 CFR § 54.313{f}(1)(ii)} Is your company a Privately Held ROR Carrier {47 CFR § 54.313{f}(2)} If yes, does your company file the RUS annual report Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313{f}(2) compliance requires:	Name of Attached Document Listing Required Information	(Yes/No) (Yes/No)
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)		
(3016)	PDF of Balance Sheet, Income Statement and Statement of Cash Flows		
(3017) (3018)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation If the response is no on line 3014, Is your company audited?	Name of Attached Document Listing Required Information	290553tn3017 (Yes/No)
	If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains		
(3019)	Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications		
(3020)	PDF of Balance Sheet, Income Statement and Statement of Cash Flows		
(3021)	Management letter issued by the independent certified public accountant that performed the company's financial audit.		
(3022)	If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains: Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers, Underlying information subjected to a review by an independent certified public accountant		
(3024)	Underlying information subjected to an officer certification.		
(3025)	PDF of Balance Sheet, Income Statement and Statement of Cash Flows		
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information	
,/			

	Certification - Reporting Carrier Data Collection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	290553	
<015>	Study Area Name	BEN LOMAND RURAL	
<020>	Program Year	2014	
<030>	Contact Name - Pers	on USAC should contact regarding this data Todd Crandall	
<035>	Contact Telephone N	lumber - Number of person identified in data line <030> 270-856-9983	
<039>	Contact Email Addres	ss - Email Address of person identified in data line <030> tcrandall@tmsvcs.	com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to	ne Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients
I certify that I am an officer of the reporting carrier; my res recipients; and, to the best of my knowledge, the informat	insibilities include ensuring the accuracy of the annual reporting requirements for universal service support in reported on this form and in any attachments is accurate.
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form ca	be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

	tion - Agent / Carrier lection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	290553	
<015>	Study Area Name	BEN LOMAND RURAL	
<020>	Program Year	2014	
<030>	Contact Name - Person USA	C should contact regarding this data Todd Crandall	
<035>	Contact Telephone Number	- Number of person identified in data line <030> 270-856-9983	
<039>	Contact Email Address - Em	ail Address of person identified in data line <030> tcrandall@tmsvcs.c	com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

ertify that (Name of Agent) revor Bonnstetter is authorized to submit the information reported on behalf of the reporting carrier. I so certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized gent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.			
Name of Authorized Agent: Trevor Bonnstetter			
Name of Reporting Carrier: BEN LOMAND RURAL			
Signature of Authorized Officer: CERTIFIED ONLINE	Date: 10/10/2013		
Printed name of Authorized Officer: Trevor Bonnstetter			
Title or position of Authorized Officer: CEO			
Telephone number of Authorized Officer: 931.473.2517			
Study Area Code of Reporting Carrier: 290553	Filing Due Date for this form: 10/15/2013		

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier			
as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided			
the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, Name of Reporting Carrier: BEN LOMAND RURAL	the information reported herein is accurat	e.	
Name of Authorized Agent or Employee of Agent: John Staurulakis, Inc.			
Signature of Authorized Agent or Employee of Agent: CERTIFIED ONLINE	Date:	10/10/2013	
Printed name of Authorized Agent or Employee of Agent: Alice Lewis			
Title or position of Authorized Agent or Employee of Agent Manager			
Telephone number of Authorized Agent or Employee of Agent: 217–498–6863			
Study Area Code of Reporting Carrier: 290553 Filing Due Date for this form:	10/15/2013		
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communi 18 of the United States Code, 18 U.S.C	,	r fine or imprisonment under Title	

Attachments

. , .	erating Companies lection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013			
<010>	Study Area Code	290553			
<015>	Study Area Name	BEN LOMAND RURAL			
<020>	Program Year	2014			
<030>	Contact Name - Person USAC should contact regarding this data Todd Crandall				
<035>	Contact Telephone Number - Number of person identified in data line <030> 270-856-9983				
<039>	Contact Email Address - Email Address of person identified in data line <030> tcrandall@tmsvcs.com				
<810>	Reporting Carrier	Ben Lomand Rural Telephone Cooperative, Inc.			
<811>	Holding Company				
<812>	Operating Company	Ben Lomand Rural Telephone Cooperative, Inc.			

<813>	<a1></a1>	<a2></a2>	<a3></a3>
	Affiliates	SAC	Doing Business As Company or Brand Designation
=	Ben Lomand Communications, LLC		
	Volunteer Wireless, LLC		
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Ben Lomand Rural Telephone Cooperative, Inc.'s demonstration of complying with applicable service quality standards and consumer protection rules:

In establishing this certification in its 2005 ETC Order,¹ the FCC found that an ETC must make "a specific commitment to objective measures to protect consumers." ² The Commission found that for wireless ETCs, compliance with CTIA's Consumer Code for Wireless Service would satisfy this requirement" and that the sufficiency of other commitments would be considered on a case-by-case basis. ³ In this context, the FCC stated, "to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement." ⁴

As a Cooperative, and in accordance with Tennessee Code Annotated, Title 65 Public Utilities and Carriers, Chapter 29 Telephone Cooperatives, Ben Lomand Rural Telephone Cooperative, Inc. ("Company") is not governed by the Rules of the Tennessee Regulatory Authority for service quality standards and consumer protection rules. However, the Company in the interest of protecting its own customers has incorporated consumer protection procedures comparable to those required of ILEC's in the State of Tennessee, allowing the Company to meet or exceed existing TRA rules. These procedures include, but are not limited to, the following: (1) publishing the rates,

¹ Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) ("2005 ETC Order").

² *Id.* at para. 28.

³ *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: "(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy." *Id.* at n. 71.

terms, and conditions of service; (2) implementation of anti-slamming and consumer protection procedures; (3) modeling bill presentation to reflect the truth-in-billing requirements; and (4) CPNI, Red Flag Rules, and other applicable federal requirements governing the protection of customers' privacy.

Ben Lomand Rural Telephone Cooperative, Inc.'s Ability to Function in Emergency Situations

Ben Lomand Rural Telephone Cooperative, Inc. ("Company") hereby certifies that it is able to function in emergency situations as set forth in Code of Federal Regulations, Title 47, Part 54, Subpart C, §54.202(a)(2). The Company's network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow the Company to manage traffic spikes throughout its network, as emergency situations require.

As a Cooperative, and in accordance with Tennessee Code Annotated, Title 65
Public Utilities and Carriers, Chapter 29 Telephone Cooperatives, Ben Lomand Rural
Telephone Cooperative, Inc. is not governed by the Rules of Tennessee Regulatory
Authority, Chapter 1220-4-2, 1220-4-2-.23 Emergency Operation. However, in
compliance with Federal emergency situations rules the Company's central offices have
adequate provision for emergency power a condition allowing them to meet or exceed
existing TRA rules for emergency operations. Specifically, each central office building
is supplied with standby generators and battery back-up that enable the central office to
keep running until power is restored so long as fuel is available, or until system changes

Section 54.202(a)(2) requires ETCs that are designated by the Commission to "demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."

are made to reroute traffic. Company has battery backup at all office locations and in its electronic equipment sites. Length of run time is determined by the equipment serving the area and the number of customers working out of the equipment.



Do you need help

paying for

Telephone Service?

You are
eligible to enroll
in the Lifeline program
if you participate in
one of the following:

Tennessee criteria:

- Food Stamps
- Medicaid
- · Supplemental Security Income (SSI)
- Temporary Assistance for Needy Families (TANF)
- Low Income Home Energy Assistance Program (LIHEAP)
- Free Lunch Program
 OR live in Section 8 federal housing.
 (Section 8 only. HUD and other federal programs may not automatically qualify).

What is REPROTEREIFAB PUBLIG MARPET TION

Established by the FCC to ensure that telephone service is available and affordable for low income telephone subscribers. Administered by the TN Regulatory Authority, the Lifeline program reduces the monthly local service portion of your telephone bill.

Lifeline does not assist with the long distance portion of your bill or with special features such as Caller ID or Call Waiting.



Two Ways to Apply for Lifeline:

If you receive one of any of the available public assistance programs (see list on front), call Ben Lomand Connect to provide you with an application.

OR

If you "DO NOT" receive public assistance, you may qualify if your total household gross monthly income is equal or less than the amounts found in the Gross Monthly Income table on the TRA website at www.tn.gov/tra/consumerfiles/teleassist.shtml

Tennessee Regulatory Authority Consumer Services Division 460 James Robertson Parkway Nashville, TN 37243-0505 1-800-342-8359 (voice) 1-888-276-0677 (TTY) 615-741-8953 (fax)



BEN SLOMAND CONNECT

REDACTED - FOR PUBLIC INSPECTION









HOME SUPPORT MY ACCOUNT WEBMAIL GREYMAIL ABOUT US CONTACT US ONLINE BILLING JOBS

Google

Business Bundles Local & Long Distance Internet TV **Secure Connect Secure Care** Cellular **Flite**

LOCAL **CALLING FEATURES VOICE MAIL** LONG DISTANCE

Local Service & Pricing

SERVICES FOR CITY OF MANCHESTER, MCMINNVILLE AND SPARTA CUSTOMERS

Residential Installation Charge Premise Visit:

\$20.00 (one time) \$35.00 (one time)

Service Connection Charge:

Residential Basic Phone Line:

\$14.00 (monthly)

Residential Coop Membership Fee:

\$10.00 (one time)

Capital Credit Information

Residential Basic Phone Line:

\$11.70 (monthly)

Explanation of Your Telephone Bill

Inside Wire Maintenance (optional):

\$2.00 (monthly)

Explanation of Inside Wire Maintenance

Beginning July 1, 2012, Ben Lomand Connect customers will see the Access Recovery Charge added to their phone bill.

Learn more . . .

Do you need help paying your telephone service? Click on the link below to learn if you are eligible to enroll in the Lifeline program.

Learn more . . .

Support & Service

Customer sevice and tech support for Internet, Phone and TV service.

Online Billing

Go paperless - view and pay your bill online.

Ben Lomand Connect Stores

Pay your bill, learn about our services, get questions answered and more.

Online Yellow Pages

Local search made simple find local businesses Phone numbers and addresses online.



Store Locator Corporate Info Terms & Conditions Privacy Policy Acceptable Use Policy Tariffs Internet/Network Practices Contact Us The Connection

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CURRENT WEATHER CONDITIONS:



BEN LOMAND TELEPHONE COOPERATIVE, INC. (SAC 290553)

 $\textbf{ATTACHMENT-LINE}\,3017$

ATTACHMENT REDACTED IN ENTIRETY